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November 14, 2011

BY CM/ECF

The Honorable Viktor V. Pohorelsky
United States Magistrate Judge
United States District Court for
the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Yung v. Trump*, No.: 1:11-cv-1413 (DLI) (VVP) (Our Ref.: TRMP 10/08087)

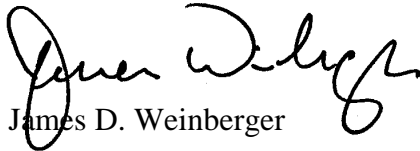
Dear Judge Pohorelsky:

We represent defendant Donald J. Trump in this matter. Pursuant to Your Honor's order on our protective order motion, Plaintiff *pro se* J. Taikwok Yung has informed us that he intends to take the deposition of Eric Trump in Room S402 at the Cadman Plaza courthouse on November 18, 2011 at 1pm. In order to ensure that the deposition is properly transcribed, our client has agreed to arrange for a certified court reporter to administer the oath, transcribe the deposition and provide plaintiff with a copy of the transcript. We write to ask for the Court's permission that a court reporter from U.S. Legal Support, Inc., 115 E. 57th Street, Suite 1230, New York, NY 10022, be permitted to enter the courthouse with the appropriate audio and transcription equipment on that date.

We sought Plaintiff's consent to join in this request, but he refused unless we agreed to let him use his own video equipment to record the deposition separately. We believe that any video recording of the deposition is superfluous, given that we are providing plaintiff with a certified copy of the transcript at our client's sole cost and expense, and further evidences Plaintiff's continued efforts to harass our client. We therefore request that he be denied the right to bring video equipment into the courthouse.

We thank the Court for its attention to this matter.

Respectfully submitted,



James D. Weinberger

cc: J. Taikwok Yung (by email and First Class Mail)